

## **REMARKS**

Claims 1-5, 7-9, and 12-23 are pending in this application. No amendments to the claims are made by this Response. Reconsideration of the claims is respectfully requested in view of the following remarks.

### **I. Objection to the Specification**

The Office Action objects to the specification stating that in claim 1, line 18 and claim 15, line 18 the word “the” appears to be missing. Applicants respectfully submit that the absence of the word “the” in the phrase “selected user option in content...” is appropriate. Inclusion of the word “the” would imply that “content” is referenced earlier in the claim, which it is not. Thus, the proper reference to “content of the one or a plurality of cells” is as provided in claims 1 and 15. Should the Examiner continue to object to the claims in this manner, Applicants are willing to modify the claim as suggested, but want to be clear that no antecedent basis rejection will be made by the Examiner if such an amendment is made. Hence, Applicants respectfully submit that claims 1 and 15 are correct as written.

The Office Action further objects to claims 21-23 stating that the terminology “computer program product” is not defined in the specification. The specification and claims must be read in light of one of ordinary skill in the art. It is not necessary to define terms that are readily apparent to those of ordinary skill in the art in the specification. Claims 21-23 recite a computer program product comprising a tangible computer useable medium having a computer readable program. A “computer program” product is any product having a computer program thereon. The claims clearly recite that the particular “product” that is being recited is a product that comprises a computer useable medium having a computer readable program. Thus, the computer program product is a product that comprises a computer useable medium having a computer readable program. There is nothing unclear in this terminology that would require an explicit definition set forth in the specification. To the contrary, those of ordinary skill in the art are quite aware of what a computer program product is, especially in light of the

fact that the claims recite that the computer program product comprises a computer useable medium having a computer readable program.

Just because the specification may not use the exact same language as is presented in the claims does not cause the specification to be insufficient or fail to provide proper antecedent basis. As long as one of ordinary skill in the art can determine the scope of the claim from the language used in the claim, and that scope is supported by the specification, there is antecedent basis for the terms used in the claim. Thus, Applicants respectfully submit that the scope of the term “computer program product” as it is used in claims 21-23 is evident to those of ordinary skill in the art and the scope is supported by the present specification.

## **II. Rejection of Claims Under 35 U.S.C. § 112, First Paragraph**

The Office Action rejects claims 3, 5, 8-9, 14, 17, 19, and 22 under 35 U.S.C. § 112, first paragraph as allegedly not complying with the enablement requirement. Applicants respectfully traverse this rejection.

With regard to claim 3, the Office Action alleges that the specification fails to provide enablement for the “user controls portion” and “control elements” recited in claim 3. As recited in claim 3, the user controls portion “provides user selectable control elements associated with each of the one or more user options.” Looking to the specification, one must determine if there is anything in the specification that supports such features and does not merely look for an explicit definition of the term “user controls portion” and “control elements” as the Examiner apparently believes is necessary. Support for features in the claim is not found only in explicit definitions but in the descriptions as a whole, including the figures which are also considered part of the specification. There may be multiple ways to refer to the various elements of an invention and Applicants are not limited to only those terms used in the specification. To the contrary, the claims are not read in a vacuum but must be interpreted in light of the specification as a whole and the understanding of those of ordinary skill in the art.

Looking at Figure 3 of the present specification, which is only one exemplary embodiment of the invention and is not limiting to the invention as recited in the claims,

it is clear that a user interface is shown, e.g., a dialog box, that includes selectable virtual buttons 303, 304, and 305 (referred to in the specification as “push-buttons”), as well as a listing of options 301 which may be scrolled through using the user selectable scroll bar element 302. Looking at the description corresponding to Figure 3, i.e. pages 15-19 of the present specification, there are numerous references to the user “clicking on” the various elements shown in Figure 3. Specifically, the specification states that “If the user decides, for any reason not detailed here, to change the current status from “TRUE” to “FALSE” or conversely from “FALSE” to “TRUE”, then the user must click with the pointing device 105 on the push-button “Change” 304” (page 17, lines 21-25). Similar statements are made for other user selectable virtual buttons shown in Figure 3 that are used to control the application of options to an electronic spreadsheet. Thus, there is clear support for the features of a user controls portion, e.g. the dialog box shown in Figure 3, of a user interface and the user controls portion having control elements, e.g., the virtual buttons. It is not necessary that the exact terminology used in the claims be explicitly defined in the specification as long as one of ordinary skill in the art may determine the scope of the terminology used in the claim in light of the specification. In the present case, it is clear that this scope is supported by the present specification as illustrated above.

With regard to claim 8, the Office Action rejects this claim stating that there is no support for the terminology “virtual buttons” because this terminology is not used in the specification. As discussed above, the terms used in the claims are not limited to only those terms used in the specification. Those of ordinary skill in the art are well aware of what a “virtual button” is and would readily understand that the “push-buttons” referred to in the specification and shown in Figure 3 are “virtual buttons.” The term “virtual” is used to specify that the buttons are not physical buttons that a user may physically press but are selectable through a user interface. This term is widely known in the art and thus, does not need an explicit definition in the specification. Figure 3 clearly shows virtual buttons and thus, there is ample support for this feature in claim 8.

The other rejected claims are rejected for similar reasons as set forth above and thus, the arguments presented above are considered to be applicable to the rejections of these claims as well. Thus, Applicants respectfully submit that there is ample support for

the features set forth in the claims. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 3, 5, 8-9, 14, 17, 19, and 22 under 35 U.S.C. § 112, first paragraph.

### **III. Rejection of Claims Under 35 U.S.C. § 112, Second Paragraph**

The Office Action rejects claims 3-5, 7-9, 14, 17-20, and 22-23 under 35 U.S.C. § 112, second paragraph as allegedly being indefinite. This rejection is respectfully traversed.

With regard to claim 3, the Office Action alleges that this claim is indefinite for basically the same reasons that the Office Action alleges that there is no support for the features of “user controls portion” and “control elements” in claim 3 above. Applicants respectfully submit that there is ample support for these features in the specification as set forth above. Thus, there is no indefiniteness with regard to the use of these terms in claim 3.

Regarding claim 4, the Office Action alleges that the use of the phrase “a value corresponding to a Boolean variable state” in line 8 is indefinite because the Boolean variable state value was previously selected by the user. There is no previous reference to a Boolean variable state value or a value corresponding to a Boolean variable state in either claim 1 or claim 4. In claim 1, values of cells are reference and the Boolean variable state being set to either True or False, but there is no reference to a Boolean variable state value as alleged by the Examiner. Thus, the use of the term “a value corresponding to a Boolean variable state” is not indefinite despite the allegations raised by the Office Action.

With regard to claim 7, the Office Action alleges that claim 7 is indefinite because it uses the term “numerical one” which could mean “of a numerical kind” or “the number 1”. The Office Action further alleges that claim 7 is indefinite because claim 1 refers to first and second Boolean variable states while claim 7 refers to “the Boolean variable state.” Applicants respectfully submit that the claim must be read as a whole rather than picking and choosing portions of the claim that, taken out of context, the Examiner may consider indefinite. It is clear that the term “numerical one” refers to the number 1 from

the fact that in the next phrase, a “numerical zero” is referenced. Moreover, reading the claims in light of the specification, it is clear that what is meant by the phrase “numerical one” is the number 1. Thus, there is nothing unclear in the use of the term “numerical one” in claim 7.

Regarding the phrase “the Boolean variable,” Applicants respectfully submit that the Examiner is not reading the entire phrase. The entire phrase recites “the value corresponding to the Boolean variable state.” It is clear that this phrase is referring to the feature “a value corresponding to a Boolean variable state of the selected user option” in claim 4, from which claim 7 depends. There is no lack of antecedent basis for the use of the phrase “the value corresponding to the Boolean variable state” in claim 7, despite the allegations raised by the Office Action.

With regard to claim 8, the Office Action alleges that there is insufficient antecedent basis for the feature “virtual button” in the claim. Applicants respectfully direct the Examiner’s attention to the arguments presented above with regard to the 112, first paragraph rejection where clear antecedent basis for “virtual button” is shown to exist in Figure 3 and the corresponding description which refers to “push-buttons.” Thus, despite the allegations raised by the Office Action, there is sufficient antecedent basis for the “virtual button” feature in claim 8.

The rejections of the remaining claims are essentially the same as for claims 3, 4, 7, and 8. Therefore, the arguments presented above with regard to claims 3, 4, 7, and 8 are also applicable to the rejections of these claims as well. Thus, Applicants respectfully submit that there is sufficient antecedent basis for all terms and phrases used in the claims. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 3-5, 7-9, 14, 17-20, and 22-23.

#### **IV. Rejection of Claims Under 35 U.S.C. § 103(a) Based on Kaneko, Kjaer, and Kernighan**

The Office Action rejects claims 1-3, 12-14, and 21-22 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kaneko et al. (U.S. Patent No. 5,708,827) in view of Kjaer et al. (U.S. Patent Application Publication No. 2002/0091728), and further in view

of Kernighan et al., The C Programming Language, Prentice-Hall, Inc., Englewood Cliffs, NJ, © 1978, page 41. This rejection is respectfully traversed.

Claim 1, which is representative of the other rejected independent claims 15<sup>1</sup> and 21 with regard to similarly recited subject matter, reads as follows:

1. A method, in a computer system, for processing user defined Boolean variables in a multi-dimensional electronic spreadsheet comprising a plurality of cells identified by a cell address along each dimension, said method comprising the steps of:

providing, in the computer system, a user options table data structure identifying one or more user options that are defined as Boolean variables, wherein the user options table data structure comprises a record for each user option of the one or more user options, and wherein each record stores an identifier associated with a corresponding user option for the record;

providing a user interface, in the computer system, through which the one or more user options are defined, wherein a status of the one or more user options is set via the user interface to either a first Boolean variable state corresponding to a “True” state or a second Boolean variable state corresponding to a “False” state;

referencing a selected user option of the one or more user options in one or a plurality of cells of the multi-dimensional electronic spreadsheet by including an identifier associated with the selected user option in content of the one or a plurality of cells;

determining a value of each of the one or plurality of cells based on a status of the selected user option as either being the first Boolean variable state or the second Boolean variable state, as specified via the user interface; and

providing an output of the multi-dimensional electronic spreadsheet via an output device of the computer system.  
(emphasis added)

Applicants respectfully submit that neither Kaneko, Kjaer, nor Kernighan, either alone or in combination, teach or suggest the features of independent claim 1 or the similar features found in independent claims 15 and 21. Specifically, none of the cited references teach or suggest the features of claim 1 emphasized above.

Kaneko is directed to a spreadsheet calculation method and apparatus for extracting an area to be updated by a calculation formula. Specifically, Kaneko teaches

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<sup>1</sup> Although claim 15 is rejected in a separate section of the Office Action based on this combination of references and further including Michelman, Michelman is only cited as teaching a processor and memory and thus, Applicants are addressing the features of claim 15 along with the other independent claims.

the use of a spreadsheet (Figure 2A) that has cells which may have formulas associated with the cells. The formulas are represented in a separate formula table (Figure 2B). When a change is made to a value in one of the cells of the spreadsheet, e.g., cell B4, this change will affect other cells in the spreadsheet that have formulas that reference the value in cell B4, as shown in Figures 3A and 3B. With the mechanism of Kaneko, the portions of the spreadsheet and formula table affected by the change to the value in cell B4 are highlighted (shown in Figures 3A and 3B by shaded areas). As shown in Figures 3A and 3B, the cells D4 and D7 are affected by the change to the value in cell B4 as well as the formulas “D4=B4\*C4” and “D7=TOTAL(D4~D6)” in the formula table. D7 is affected by the change because the formula for D7 references cell D4 which is affected by the change to the value in cell B4.

Nowhere in Kaneko is there any teaching or suggestion regarding a table of user options that are defined as Boolean variables. The Office Action fails to specifically state what the Examiner considers to be the same as this feature and instead just merely refers to alleged teachings in the reference without equating them to any feature in the claims. Thus, it is left to Applicants to guess at what the Examiner is assuming is the same as the user options table recited in claim 1. Since the spreadsheet is clearly shown in Figures 2A and 3A of Kaneko, it can only be assumed that the Examiner is equating the formula table of Figures 2B and 3B with the user options table of claim 1. However, the formula table of Figure 3B does not specify user options and does not specify user options that are defined as Boolean variables.

To the contrary, the formula table merely provides a depiction of the formulas that are presently being used in the spreadsheet. There is no ability in Kaneko to define a user option in the formula table of Kaneko, let alone set a status of user options in the formula table of Kaneko to either a first Boolean variable state corresponding to a “True” state or a second Boolean variable state corresponding to a “False” state, as recited in claim 1.

There are two separate interfaces recited in claim 1: the electronic spreadsheet, and the interface for defining user options, which may be referenced in one or more cells of the electronic spreadsheet. Kaneko clearly teaches a spreadsheet. However, nowhere in Kaneko is there any teaching or suggestion regarding an interface through which user options may be defined and through which the state of user options may be set to either a

first Boolean variable state or a second Boolean variable state, as recited in claim 1. To the contrary, the values of the various cells referenced in the formulas of the formula table shown in Kaneko are set based on the values entered into the cells of the spreadsheet, the cells being referenced by formulas. There is no separate interface through which user options are defined, as recited in claim 1.

In fact, Kaneko is not even concerned with defining user options as Boolean variables in a separate user options table data structure using a separate interface from that of the spreadsheet. To the contrary, Kaneko is concerned with displaying the effects of changes to the values in cells of the spreadsheet in both the other cells of the spreadsheet and the formulas used in the spreadsheet. Kaneko is not concerned with providing user options in the manner recited in claim 1.

It is important to realize that the claim, when properly read, requires a separate user option table data structure and interface for defining the user options in the user option table data structure. These are separate from the spreadsheet itself. Thus, user options are defined in this separate user option table data structure using the separate interface and the status of the user options is set via this separate interface. The user options defined in this manner via the user interface may be referenced in the spreadsheet.

To the contrary, in Kaneko, values are specified in cells of the spreadsheet and a formula table is used to display the formulas used in the spreadsheet. Nowhere in Kaneko is there any teaching of any mechanisms like the separate user options table data structure and separate interface recited in claim 1.

Since Kaneko does not teach an interface through which user options are defined as recited in claim 1, Kaneko cannot be found to teach or suggest the feature of determining a value of each of the one or plurality of cells based on a status of the selected user option as either being the first Boolean variable state or the second Boolean variable state, as specified via the user interface. Thus, Kaneko does not teach or suggest the features of claim 1.

Kjaer, likewise, does not teach or suggest these features of claim 1. Kjaer is cited as teaching a multidimensional spreadsheet. While Kjaer may teach a multidimensional spreadsheet, nowhere in Kjaer is there any teaching or suggestion regarding a user



options table data structure or an interface for defining user options in the user options table data structure, such as recited in claim 1.

Similarly, Kernighan does not teach or suggest these features of claim 1. While Kernighan may teach the ability to set expressions to 1 if true and 0 if false, there is no teaching or suggestion in Kernighan regarding a user options table data structure or an interface for defining user options in the user options table data structure. Merely teaching the ability to set things to 1 if true or 0 if false does not teach or suggest the specific features of claim 1 with regard to the separate user options table data structure and interface.

Since none of the references teach or suggest the features of claim 1 emphasized above, any alleged combination of the references, even if such a combination were somehow possible and one were somehow motivated to attempt such a combination, would not result in the features of claim 1 being taught or suggested. To the contrary, an alleged combination of Kaneko, Kjaer, and Kernighan would result in a multidimensional spreadsheet mechanism in which a formula table may be provided such that the effects of changes to values in cells of the multidimensional spreadsheet are highlighted in the display of the spreadsheet and formula table. The addition of Kernighan may teach that values in the cells of the spreadsheet may be set to 1 or 0 in order to represent true or false, but there is no separate interface from the spreadsheet that is used to define user options in a user options table data structure and set their status to either a first Boolean variable state corresponding to a “True” state or a second Boolean variable state corresponding to a “False” state, the user options being able to be referenced in one or more cells of the spreadsheet.

Thus, Applicants respectfully submit that neither Kaneko, Kjaer, nor Kernighan, either alone or in combination, teach or suggest the features of independent claims 1, 15 and 21. At least by virtue of their dependency on claims 1 and 21, the alleged combination of references does not teach or suggest the features of dependent claims 2-3, 12-14, and 22. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-3, 12-14, and 21-22 under 35 U.S.C. § 103(a).

In addition to the above, the alleged combination of references also does not teach or suggest the specific features recited in claims 2-3, 12-14, and 22. For example, with

regard to claim 2, there is no teaching or suggestion in any of the cited references regarding each record in a user options table data structure comprising a user option index, a name of a corresponding user option associated with the record, and a status value of the corresponding user option associated with the record. The formula table of Kaneko does not provide any of these features. The formula table of Kaneko only displays the formulas currently used in the spreadsheet with no status values, names of user options, or indices provided.

Moreover, the Office Action appears to be interpreting the spreadsheet of Kaneko to be the same as the user options table data structure of claim 2. If this were the case, then where is the spreadsheet provided in Kaneko? Claim 1, from which claim 2 depends, clearly recites a spreadsheet and a separate user options table data structure and separate interface for defining these user options. If the spreadsheet of Kaneko is interpreted to be the same as the user options table data structure, then in order for Kaneko to teach the features of the claim, Kaneko must also teach or suggest a separate spreadsheet. Where is this separate spreadsheet shown in Kaneko? Applicants respectfully submit that the Examiner is misinterpreting Kaneko. The spreadsheet of Kaneko is clearly shown in Figures 2A and 3A (see column 4, lines 10-12, "...FIG. 2A shows an example of the display of the contents of the spread sheet data table 28..."). Thus, the only thing that could possibly even be the user options table data structure is the formula table shown in Figures 2B and 3B. However, the deficiencies of this formula table with regard to the features of claims 1 and 2 have been detailed above.

With regard to claims 3 and 22, none of the cited references teach or suggest a user interface for defining user options in a user options table data structure that is separate from the spreadsheet, the user interface comprising a user options listing portion, a status portion, and a user controls portion as recited in claim 3. With regard to these features, the Office Action points to some elements of the spreadsheet shown in Figure 2A of Kaneko and other elements of the formula table shown in Figure 3B of Kaneko. The Office Action alleges that fields of the spreadsheet may be selected and modified by the user and these modifications may be reflected in updates of fields of the spreadsheet. Moreover, the Office Action alleges that the formula table lists formulas in a display, determines a current status of option values, and updates fields of the spreadsheet.

Again, the depiction in Figure 2A is of the spreadsheet itself, not a user options table data structure that is separate from the spreadsheet and that lists user options that may be referenced in one or more cells of a spreadsheet. Moreover, the spreadsheet of Kaneko does not provide a listing of user options, a status portion that identifies a current status of the user option, or a user controls portion that provides user selectable control elements that change a status of a corresponding user option and updates a corresponding record in the user options table data structure. The cells of the spreadsheet in Kaneko may store values and formulas and may be editable by users. However, this is the spreadsheet in Kaneko, not a separate user options table data structure. Moreover, there is no user controls portion in the spreadsheet of Kaneko that has control elements that when selected, cause changes to the status of corresponding user options.

Regarding claim 14, nowhere in any of the references is there any teaching or even suggestion regarding user options being presented in a user options listing portion of a user interface according to an index sequence of indices starting with an index representing a last recorded user option. The Office Action merely states that Kaneko's spreadsheet window has an ordered list of merchandise. Again, the spreadsheet window in Kaneko is the spreadsheet, not an interface for defining user options in a user options table data structure that is separate from the spreadsheet. Moreover, there are no indices in the spreadsheet of Kaneko. There are cell references, such as "A", "B", "1", "2" for specifying a cell, but there are no indices for user options in the spreadsheet of Kaneko. Moreover, there is nothing in Kaneko that teaches to present user options starting with an index representing a last recorded user option. There is no way in Kaneko to determine what is the last recorded user option (especially since Kaneko does not even teach or suggest a user options table data structure or interface for defining user options, as discussed at length above).

Thus, in addition to being dependent upon their respective independent claims, the alleged combination of references also does not teach or suggest the specific features of the dependent claims. Accordingly, Applicants respectfully request withdrawal of the rejection of the dependent claims under 35 U.S.C. § 103(a).

**V. Rejection of Claims Under 35 U.S.C. § 103(a) Based on Kaneko, Kjaer, Kernighan, and Michelman**

The Office Action rejects claims 4, 7, 15-18, 20, and 23 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kaneko, Kjaer, and Kernighan, and further in view of Michelman. This rejection is respectfully traversed.

The rejection of claims 4, 7, 15-18, 20 and 23 is traversed for at least the same reasons as set forth above with regard to independent claims 1, 15 and 21. Michelman does not provide any teaching or suggestion that alleviates the deficiencies of Kaneko, Kjaer, and Kernighan as discussed above. Moreover, Michelman does not provide for the deficiencies of the other references with regard to dependent claims 16 and 17 as discussed above with regard to similar features found in claims 2, 3 and 22.

Thus, even if Michelman were somehow combinable with the other references, and one were somehow motivated to attempt such a combination, the result would not be the invention as recited in independent claims 1, 15, and 21, from which claims 4, 7, 16-18, 20, and 23 depend. Moreover, the addition of Michelman provides no additional teaching or suggestion that obviates the features of claims 16 and 17 for similar reasons as set forth above with regard to claims 2, 3 and 22. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 4, 7, 15-18, 20, and 23 under 35 U.S.C. § 103(a).

**VI. Rejection of Claims Under 35 U.S.C. § 103(a) Based on Kaneko, Kjaer, Kernighan, and Kelly**

The Office Action rejects claims 5 and 8-9 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kaneko, Kjaer, Kernighan, and further in view of Kelly (Using Microsoft Excel 97, 3<sup>rd</sup> Edition, Que Corp., Indianapolis, IN, 1998, pages 118-122). This rejection is respectfully traversed.

The Office Action admits that Kaneko does not teach the user of an editor or GUI buttons/dialog boxes but alleges that Kelly teaches these features. While Kelly might teach such features, Kelly does not provide any teaching or suggestion to alleviate the

deficiencies of Kaneko, Kjaer, and Kernighan discussed above with regard to claim 1 from which claims 5 and 8-9 depend. Moreover, nowhere in any of the references is there any teaching to include an editor in a user option listing of a user interface that is used to define user options in a user option table data structure that is separate from the electronic spreadsheet, as recited in claim 5. Claim 5 does not merely recite “an editor” as the Office Action would seem to allege. To the contrary, claim 5, is dependent from claim 3, which in turn is dependent from claim 1. Thus, the Examiner must consider all of the limitations and their interrelations in the claims. Here, the editor is provided in a user option listing portion of a user interface. The user interface is a user interface for defining user options in a user option table data structure. The user options table data structure and the user interface are separate features from the spreadsheet.

Thus, claim 5 does not merely recite “we claim an editor” but a specific combination of features. Merely teaching an editor in a spreadsheet does not obviate this specific combination of features set forth in claim 5. None of the cited references, either alone or in combination, teach or suggest an editor in a user option listing of a user interface that is used to define user options in a user option table data structure that is separate from the electronic spreadsheet, as recited in claim 5.

Similarly, claim 8 recites that the control elements in the user controls portion of the user interface specified in claim 3 are virtual buttons. The user interface specified in claim 3 is the user interface used to define user options in a user options table data structure, as recited in claim 1. Thus, again, Applicants are not merely reciting “virtual buttons” in general, but a specific combination of features. None of the cited references teach or suggest control elements in a user controls portion of a user interface used to define user options in a user options table data structure, and being separate from an electronic spreadsheet, being virtual buttons.

Similar arguments apply to claim 9 as well. Again, the Examiner is not considering the totality of the claim but only piecemeal addressing the features. Merely finding a dialog box in a reference does not necessarily obviate a particular user interface recited in the claims being a dialog box.

Thus, for the reasons set forth above, Applicants respectfully submit that none of the cited references, whether taken alone or in combination, teach or suggest the features

of claims 5 and 8-9. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 5 and 8-9 under 35 U.S.C. § 103(a).

**VII. Rejection of Claims Under 35 U.S.C. § 103(a) Based on Kaneko, Kjaer, Kernighan, Michelman, and Kelly**

The Office Action rejects claim 19 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kaneko, Kjaer, Kernighan, Michelman, and Kelly. This rejection is respectfully traversed.

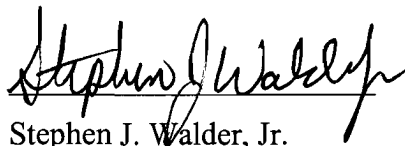
The features of claim 19 are similar to those of claim 5 above. Thus, the arguments presented above with regard to the combination of Kaneko, Kjaer, Kernighan, and Kelly also apply to claim 19. Michelman does not provide any teaching or suggestion to render the features of claim 19 obvious. To the contrary, the Office Action explicitly cites Kelly as allegedly teaching the features of claim 19. The deficiencies of Kelly, and the combination of Kelly with the other references, have been discussed above. Thus, for similar reasons as set forth above with regard to claim 5, Applicants respectfully request withdrawal of the rejection of claim 19 under 35 U.S.C. § 103(a).

**VIII. Conclusion**

It is respectfully urged that the subject application is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

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